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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

NEBYOU SOLOMON, an individual,

Plaintiff,

vs.

LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT; JOSEPH LOMBARDO,  
individually and in his official capacity as  
Sheriff; JOHN L. PELLETIER, an  
individual; RICHARD E. MAUPIN, an  
individual; RYAN J. FRYMAN, an  
individual; JUAN D. CONTRERAS, an  
individual; ALLEN J. PAVESE, an  
individual; BRANDON M. MEADS, an  
individual; DOES I – V, individuals,

Defendants.

Case. No.: 2:19-cv-00652-JAD-DJA

**STIPULATION AND ORDER TO  
EXTEND PLAINTIFF'S DEADLINE  
TO FILE RESPONSE TO  
DISPOSITIVE MOTION**

**(THIRD REQUEST) [ECF No. 124]**

Plaintiff NEBYOU SOLOMON, and Defendants LAS VEGAS METROPOLITAN  
POLICE DEPARTMENT, JOSEPH LOMBARDO, JOHN L. PELLETIER, RICHARD E.  
MAUPIN, RYAN J. FRYMAN, JUAN D. CONTRERAS, ALLEN J. PAVESE, and  
BRANDON M. MEADS (collectively "Parties") by and through their respective counsel,  
hereby stipulate to the following:

1. The Parties hereby agree and stipulate to that Plaintiff NEBYOU  
SOLOMON shall have an additional fourteen (14) days to file his Response in Opposition to  
LVMPD Defendants' Motion for Partial Summary Judgment (ECF No. 118) filed on October

18, 2021.

2. The current Response deadline is December 6, 2021 (*see* ECF No. 123), and the requested extension would make the new deadline be December 20, 2021.

3. This extension of time is necessary to ensure concise and appropriate briefing, which will in turn increase the likelihood that this case is decided on its merits rather than on a technicality.

4. Lead counsel for Plaintiff has been undergoing medical issues, including lingering problems caused by the medical issue referenced in ECF No. 123 (at p. 2:7), which have affected the dates and deadlines in several of lead counsel's cases.

5. Counsel for Plaintiff also has several different competing deadlines, such as a response to a Motion to Dismiss in *Benson v. Las Vegas Metropolitan Police Department*, Case No. 2:21-cv-01928-RFB-BNW and a response to an Order to Show Cause in *Las Vegas Metropolitan Police Department v. Las Vegas Review-Journal*, Nevada Supreme Court Case Nos. 82867 / 83430, both of which are due on December 6, 2021.

6. Further, additional time is necessary for Plaintiff's counsel to prepare affidavits of witnesses to submit as exhibits to oppose Defendants' Motion for Summary Judgment.

7. Finally, counsel for Plaintiff has recently undergone unexpected personnel changes, which requires lead counsel to devote substantial time to obtaining new personnel.

8. This is the third stipulation for an extension of time in this matter and the requested additional time to ensure proper representation of the Parties' interests and quality briefing.<sup>1</sup>

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<sup>1</sup> The deadline to file motions for summary judgment was also previously extended.

9. This request is made in good faith and is not sought for any improper purpose or for the purpose of delay.

**IT IS SO STIPULATED.**

DATED this 2<sup>nd</sup> day of December, 2021.

DATED this 2<sup>nd</sup> day of December, 2021.

**MCLETCHE LAW**

**MARQUIS AURBACH COFFING**

/s/ Leo S. Wolpert

/s/ Nicholas D. Crosby

Margaret A. McLetchie, NBN 10931

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*Attorney for Defendants Las Vegas*

*Attorneys of Plaintiff Nebyou Solomon*

*Metropolitan Police Department; Joseph*

*Lombardo; John L. Pelletier; Richard E.*

*Maupin; Ryan J. Fryman; Juan D.*

*Contreras; Allen J. Pavese; and Brandon*

*M. Meads*

**ORDER**

**IT IS SO ORDERED.** The deadline to respond to the Motion for Summary Judgment [118] is extended to 12/20/2021.

  
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U.S. DISTRICT COURT JUDGE

DATED: 12//7/2021, nunc pro tunc to 12/6/2021